

UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY	
McMANIMON, SCOTLAND & BAUMANN, LLC 75 Livingston Avenue, Suite 201 Roseland, NJ 07068 (973) 622-1800 Anthony Sodono III (asodono@msbnj.com) Sari B. Placona (splacona@msbnj.com) <i>Counsel to Daryl Fred Heller</i> <i>Chapter 11 Debtor and Debtor-in-Possession</i>	
In re:	Case No. 25-11354 (JNP)
DARYL FRED HELLER,	Chapter 11
Debtor.	

**NOTICE OF MOTION FOR AN ORDER APPROVING THE AGREEMENT
BETWEEN THE DEBTOR, CHARLENE R. HELLER, AND ORRSTOWN
BANK PURSUANT TO 9019 OF THE FEDERAL RULES OF BANKRUPTCY
PROCEDURE**

PLEASE TAKE NOTICE that on June 2, 2025 at 11:00 a.m. or as soon thereafter as the movant may be heard, Daryl Fred Heller (the “Debtor”), the Chapter 11 Debtor and Debtor-in-Possession, by and through his counsel, McManimon, Scotland & Baumann, LLC will move before the Honorable Jerrold N. Poslusny, Jr., United States Bankruptcy Judge, at the United States Bankruptcy Court, Mitchell H. Cohen U.S. Courthouse, 400 Cooper Street, 4th Floor, Courtroom 4C, Camden, New Jersey 08101, pursuant to his Motion for an Order Approving the Agreement between the Debtor and Charlene R. Heller and Orrstown Bank pursuant to 9019 of the Federal Rules of Bankruptcy Procedure (the “Motion”)

PLEASE TAKE FURTHER NOTICE the Debtor shall rely upon the Certification of Sari B. Placona in Support of Motion and Memorandum of Law submitted concurrently herewith.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy in accordance with D.N.J. LBR 9013-2.

PLEASE TAKE FURTHER NOTICE that unless an objection is timely filed and served, the Motion shall be deemed uncontested, and the relief may be granted without a hearing.

PLEASE TAKE FURTHER NOTICE that an order granting the relief requested herein is submitted herewith and made part of the Motion herein.

Dated: April 30, 2025

**McMANIMON, SCOTLAND,
& BAUMANN, LLC**
Counsel to Daryl Fred Heller
Chapter 11 Debtor and Debtor-in-Possession

By: /s/ Sari B. Placona
SARI B. PLACONA